

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

KAMEL B. JONES, JR. :
Plaintiff, :
v. : Case No. 1:22-cv-02628-JRR
THE CITY OF SALISBURY, MARYLAND, *et al.* :
Defendant. :

MOTION TO STRIKE APPEARANCE OF PLAINTIFF'S COUNSEL

COMES NOW Jeanett P. Henry, counsel of record for Plaintiff, Kamel Jones, and pursuant to Local Rule 105 and 101.2 (a) moves to strike her appearance, stating as follows:

1. Counsel entered her appearance on behalf of Plaintiff on November 14, 2022.
2. Since entering the case counsel has represented Plaintiff in filing an Amended Complaint, litigated defendants' motion to dismiss, exchanged and responded to written discovery. Depositions were scheduled of Plaintiff, Defendant and 4 witnesses for May 8-30, 2024, but now delayed.
3. Unfortunately, there has been a breakdown in the attorney-client relationship between Plaintiff and undersigned counsel of significant magnitude that it has made continued representation impossible.
4. In accordance with Local Rule 101.2 (a) on May 8, 2024 counsel emailed and mailed the requisite notice to Plaintiff that she would file a motion to withdraw her appearance on or about May 15, 2024. *See Ex. 1.* Plaintiff understood that a motion to strike appearance would be a likely consequence of an irretrievable breakdown in the attorney-client relationship.
5. Plaintiff would not be "prejudiced" by counsel's withdrawal. Admittedly, under the

current schedule, discovery is scheduled to close on June 7, 2024. However, to avoid any prejudice to Plaintiff, undersigned counsel conferred with defendants' counsel and obtained his consent to file a motion requesting the Court extend the remaining dates in the schedule by three (3) months. This would allow Plaintiff time to secure new counsel, if he chooses, schedule and complete depositions.

6. Defendants have no objection to this request for withdrawal.

WHEREFORE, counsel respectfully prays that her appearance as counsel for Plaintiff be stricken.

Respectfully submitted,

/s/ Jeanett P. Henry
Jeanett P. Henry, [Bar No.22571]
8403 Colesville Road; Suite 1100
Silver Spring, MD 20910
Tel.: (301) 562-1340
Email: jhenry2085@aol.com
Counsel for Plaintiff

CERTIFICATION OF COUNSEL

I, Jeanett P. Henry, hereby certify that on May 8, 2024 I emailed and mailed Plaintiff the requisite notice required by Local Rule 101(2)(a), informing him of my intent to file a motion to strike my appearance, that he should have his new counsel enter an appearance in the case as soon as possible, or if he elected not to hire new counsel but to represent himself, that he should so notify the Clerk of this Court with the address to send such notification. Plaintiff's last known address is 375 Walnut Avenue, Apartment J, Carlsbad, CA 92008; email – kamelion@live.com.

/s/ Jeanett P. Henry
Jeanett P. Henry

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of May, 2024 I served an electronic copy of the foregoing Motion to Strike Appearance of Plaintiff's Counsel on Raymond R. Mulera, Esquire via ECF and on Plaintiff by email and first class mail as follows:

Kamel Jones
375 Walnut Avenue
Apartment J
Carlsbad, CA 92008
Email: kamelion@live.com

/s/ Jeanett P. Henry

Jeanett P. Henry